



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building
P.O. Box 8468
Harrisburg, PA 17105-8468
March 16, 2011

717-787-1729

Bureau of Air Quality

Ms. Jayne Browning
Saint-Gobain Containers, Inc.
Saint Gobain Place
Port Allegany, PA 16743-0069

Dear Ms. Browning:

The test protocol to determine the sulfur dioxide (EPA Method 6C), nitrogen oxides (EPA Method 7E), carbon monoxide (EPA Method 10), volatile organic compounds (EPA Method 25A), filterable/condensable particulate matter (EPA Method 5/202), particulate matter 2.5 μ and 10 μ (EPA Method 201A), and visible (EPA Method 9) emissions of glass furnace No. 1 (Source ID 101) at Saint Gobain Container, Inc.'s facility in Port Allegany Borough, McKean County is **unacceptable** to the Department unless the following conditions are met:

1. Conduct a pretest cyclonic flow check and provide data in the final report.
2. Conduct a pretest gas stratification check and provide data in the final report.
3. The minimum probe rinse for each FPM (EPA Method 5) test run must be at least 30 mL per foot of probe or 200 mL, whichever is greater, to ensure effective recovery.
4. A minimum sample volume of 50 dscf shall be collected for each run of EPA Method 5. The filter temperature shall be maintained at 248°F +/- 25°F.
5. Filterable particulate results shall be presented as gm/kg of glass produced and calculated using equation § 60.296 (d)(1) of 40 CFR 60, Subpart CC. Total particulate results shall be presented as gr/dscf, lb/hr, lb/ton glass produced and ton per year for all four components of the total: filterable, organic condensable, inorganic condensable, and total particulate matter.
6. If at a later time the results from EPA Method 201A are to be used to determine total particulate, the back-half shall be an EPA Method 202 train instead of an EPA Method 5 train. EPA Method 201A on its own provides results for filterable particulate matter 2.5 μ and 10 μ .
7. EPA Method 6C, 7E, 10, and 25A test runs and data collection shall be for three runs of at least 60 minutes each.



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8. For the instrumental testing, all calibration and drift checks must be completed, documented and reported. The span must be chosen appropriately based on **actual stack concentration**. Be prepared to have calibration gases for the percentages of span listed in the method. The calibration gases shall bracket the actual stack concentration. If any of these items are excluded from the final report or not performed in strict accordance with the method, the results will be unacceptable. Follow the revisions to EPA Methods 3A, 6C, 7E and 10.
9. Results from the instrumental tests (6C, 7E, and 10) shall be presented as ppmvd, lb/hr, lb/ton of glass produced, and ton per year.
10. The following conditions pertain to any Method 25A sampling.
 - a. The entire Method 25A sampling system must be heated to $375 \pm 25^\circ\text{F}$ ($185 \pm 5^\circ\text{C}$) to prevent condensation of VOCs and water vapor. If this is not done, a special system bias gas, approved by the Department prior to testing, is mandatory. The temperature of each heated sampling line must be recorded at 15-minute intervals during testing and included in the test report.
 - b. The span, the subset of the instrument range over which the analyzer is calibrated, shall not be more than 2.5 times the actual total hydrocarbon (THC) concentration for each run. For concentrations less than 10 ppmv, a span of 0-10 ppmv is acceptable.
 - c. The time required to conduct each calibration error and drift test, required by Method 25A, should not exceed the average system response time, determined prior to testing. If the post-test response time is more than twice the pretest response time or five minutes, whichever is longer, condensation is likely and the run must be repeated. The instrument response times for each run must be provided in the test report.
 - d. The VOC results (ppmvd, lbs/hour, and tons per year) should be reported as propane (C_3H_8) and in accordance with §3.2.1.3 of the Department's Source Testing Manual.
11. Record process parameters to completely document the process operation during each test run at **15-minute intervals**. Data shall also be collected during the cyclonic flow check and gas stratification check. This data (including the units) and a summary thereof, averaged over each test run, must be included in the test report. Contact Matthew Williams at (814) 332-6131 to review the process data collected from the previous test programs and confirm the parameters that will be collected for this test program.
12. The Environmental Laboratory Accreditation Act (Act 2002 - 25) requires that all laboratories performing testing or analysis of environmental samples, required by a statute administered by the Department of Environmental Protection (DEP), register with DEP. The registration fee is \$50. Registration serves as an interim authorization to perform testing and analysis of environmental samples. Refer to: <http://www.dep.state.pa.us/dep/deputate/mts/bol/> for additional information. The testing firm(s) and all analytical laboratories **must** verify that they have registered in accordance with this act.
13. The first page of the test report shall be a Test Results Summary (TRS). The TRS shall contain a table listing the following: the source and source ID numbers; the average result(s) of each pollutant measured in units of the permit limit(s); permit limit(s) for each pollutant measured;

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permit number(s) where limit was obtained; and whether results demonstrate compliance or non-compliance with permit limit(s).

14. Provide the Source Testing reference method testing results and report under separate cover from the RATA results and report. Review Section §2.1.1 of the Department's Source Testing Manual and provide the appropriate information in the final report.

Final acceptance of the test program will be contingent upon fulfillment of all of the applicable requirements specified in Title 25, Chapter 139 of the PA Code; Title V Permit 42-00028; Plan Approval 42-028B; 40 CFR 60, Subpart CC; 40 CFR 63, Subpart SSSSSS; the Global Consent Decree effective May 7, 2010; and the Department's Source Testing Manual, Revision 3.3. If there are any questions regarding this matter, please contact me at your convenience.

Sincerely,



AnnMary K. Bihl
Source Testing Section
Division of Source Testing and Monitoring

cc: Ms. Katherine Orlowski
CK Environmental, Inc.
1020 Turnpike Street, Suite 8
Canton, MA 02021

Roger Jordan, Air Program, Warren/Knox District Office, Northwest Regional Office
~~Matthew Williams, Chief, Facilities Permitting Section, Northwest Regional Office~~
Reading File, Source Testing Section

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